

Revised Robocall Mitigation Database (RMD) Plan

Davosec LLC

FCC Filing – Robocall Mitigation Database

1. Company Information

Company Name: Davosec LLC

Business Type: VoIP Reseller

Carrier/Upstream Provider: VOIP Innovations (Sangoma)

FCC Registration Number (FRN): 0031318660

Company Address: 19815 Timberfield Place, Katy Tx - 77449

Contact Name & Title: Mustafa Motiwala (Manager)

Contact Phone: 832-654-4086

Contact Email: mustafa.motiwalaa@davosec.com

Davosec LLC is a registered VoIP reseller providing retail VoIP services to small businesses and retail customers. Davosec and its customers do not originate high volume calls or robocall traffic and is committed to preventing the origination, transit, or termination of unlawful robocalls on its network.

2. Certification of STIR/SHAKEN Implementation

Davosec LLC is a VoIP reseller and does not directly originate or terminate calls on the PSTN. Instead, it relies on VOIP Innovations, its upstream provider, which has implemented full STIR/SHAKEN call authentication in the IP portions of its network.

As a reseller, Davosec LLC ensures that all originated traffic passes through VOIP Innovations' network, which provides attestation and call authentication services. Additionally, Davosec applies alternate robocall mitigation procedures described below in Robocall Mitigation section.

3. Robocall Mitigation Program

Although Davosec LLC relies on VOIP Innovations for STIR/SHAKEN call authentication, it has implemented its own internal robocall mitigation program to prevent the origination of illegal or fraudulent robocalls.

a. Customer Vetting

In order to prevent or minimize the origination of illegal robocalls through its voice services, Davosec uses best practices in vetting the identity of all of its voice service subscribers, whether it's a residential or business subscriber. The subscriber vetting process is intended to help determine the legitimacy of a customer for the purpose of establishing a service relationship. Generally, our company looks to confirm the identity of customers using its voice services through collecting information such as physical customer location, contact person(s), federal tax ID, and the nature of the customer's business. Our efforts to vet retail and business/commercial subscribers occurs during the process of provisioning customer requested services (for example in appropriately sizing the facilities to their claimed intended use), executing the required service agreements, and granting the customer the right to use telephone number resources. Commercial end users are subjected to an additional review, including a more stringent background check and possibly a site visit.

All our customers undergo Know **Your Customer (KYC)** verification before activating new accounts, including:

- Business registration validation (EIN, Business License).
- Identity verification (government-issued ID for authorized representatives).
- Call use-case verification (e.g., contact centers, enterprise communications).
- Customers suspected of engaging in unlawful robocalling are rejected or terminated.

b. Traffic Monitoring

Davosec has established a routine process for monitoring of the usage and quality of its network facilities and conducts recurring and timely reviews of its call detail records (CDRs) to facilitate early identification of unusual or suspicious calling activity or patterns that may indicate use of the network for originating illegal robocalls. In the instance where our system will identify activity or a pattern consistent with illegal robocalls the customer will be contacted within twenty-four hours for further investigation and possible action regarding their subscribed to voice service.

Davosec has continuous monitoring of call patterns for:

- High-volume short-duration traffic.
- Calls to known Do-Not-Call (DNC) list numbers.
- Suspicious spikes in call origination.
- Automated alerts trigger a review when abnormal traffic patterns are detected.

c. Telephone Number Validation Practice

Davosec has a validation practice in place to only allow the customer to use a telephone number in connection with their subscribed voice service(s). There is procedure in place to confirm the calling customer's right to use a telephone number. Call spoofing is not permitted in our system.

c. Complaint Handling

- Dedicated reporting channel for traceback requests and consumer complaints.
- Rapid investigation and response to all inquiries from the **Industry Traceback Group (ITG)** and law enforcement.
- Escalation process to suspend or terminate accounts proven to engage in unlawful traffic.

d. Traceback Cooperation

- Davosec LLC now has the procedure in place to fully cooperate with the ITG in all traceback requests.
- Will provide call detail records (CDRs) and account information as required by the FCC within the mandated timeframe.

e. Customer Enforcement

For meeting existing obligations to take affirmative, effective measures to prevent new and renewing customers from originating illegal calls, Davosec utilizes service agreements and acceptable use policies as a means of preventing its new and existing subscribers from using the service in ways that would be in violation of local, state, or federal laws, or to engage in deceptive or fraudulent activity.

These documents governing use of Provider provided services include terms indicating specifically to all customers that their services should not be used for the purpose of making illegal robocalls, and Davosec reserves authority within its service agreements to suspend or terminate a subscriber's voice service for violating applicable service-related terms.

- Contractual prohibition against unlawful robocalling.
- Progressive enforcement measures:
 - Customer notification and remediation request
 - Temporary call blocking or suspension of services
 - Permanent termination for repeated or egregious violations

4. Compliance Statement

Davosec LLC certifies that it:

1. Uses VOIP Innovations as its upstream carrier, which provides full STIR/SHAKEN implementation.
2. Has implemented the above-described robocall mitigation program to prevent unlawful robocalls from originating on its network.
3. Fully complies with the FCC's Robocall Mitigation Database reporting requirements.
4. Will maintain and update mitigation procedures to remain compliant with FCC regulations.

5. Contact for Traceback & FCC Inquiries

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